

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

JURY DEMANDED

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF PLAINTIFF
HEADWATER RESEARCH LLC'S MOTION FOR LEAVE TO SUPPLEMENT
EXPERT REPORTS BASED ON NEWLY PRODUCED INFORMATION**

1. I, Kristopher Davis, declare as follows:

2. I am counsel for Headwater Research LLC (“Headwater”) in the above-captioned action. I provide this declaration in support of Headwater’s Motion for Leave to Supplement Expert Reports Based on Newly Produced Information. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

3. Attached as Exhibit A is a true and correct copy of the Supplemental Expert Report of Erik de la Iglesia Regarding Infringement by Samsung, dated October 25, 2024.

4. Attached as Exhibit B is a true and correct copy of the Supplemental Expert Report of Stephen Dell Regarding Damages, dated October 25, 2024.

5. Attached as Exhibit C is a true and correct copy of Headwater emails to Samsung regarding supplemental expert reports, dated October 25, 2024 and October 31, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 1, 2024 at Los Angeles, California

By: /s/ Kristopher Davis
Kristopher Davis

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3).

/s/ Kristopher Davis
Kristopher Davis